

**Patrick J. Ehlers**  
Email: patrick\_ehlers@fd.org  
Federal Public Defender's Office  
101 SW Main Street, Suite 1700  
Portland, OR 97204  
Tel: (503) 326-2123  
Fax: (503) 326-5524

**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**CR 11-096 MO**

**Plaintiff,**

**MOTION TO CONTINUE  
TRIAL DATE**

**v.**

**KAO FEY SAECHAO,**

**Defendant.**

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Defendant Kao Fey Saechao, through his attorney, Patrick J. Ehlers, moves this Court to continue the trial which is presently scheduled for Tuesday, September 6, 2011, for a period of approximately 60 days to Tuesday, November 8, 2011, or a date thereafter convenient to the Court. Additional time is requested to allow sufficient time to complete review of discovery, investigation, research, and consultation with Mr. Saechao regarding his case. This is Mr. Saechao's third request to continue the trial date. This motion is unopposed by Assistant United States Attorney Scott

Kerin.

This continuance constitutes excludable delay to November 8, 2011, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Saechao in a speedy trial because the additional time is necessary to defense counsel sufficient time to complete discovery review, investigate the case, conduct research, consult with Mr. Saechao, and prepare his case. Mr. Saechao acknowledges his right to a speedy trial under the Speedy Trial Act and agrees that this motion will result in excludable delay under the Act.

RESPECTFULLY SUBMITTED this August 23, 2011.

/s/ Patrick Ehlers

Patrick J. Ehlers  
Attorney for Defendant